

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CLOVER HEALTH INVESTMENTS
CORP., AND CLOVER HEALTH LLC,

Plaintiff,

v.

ZOE FARRELL,

Defendant.

Hon. Kevin McNulty, U.S.D.J.
Hon. Steven C. Mannion, U.S.M.J.

Civil Action No. 18-16802

**NOTICE OF MOTION TO SEAL
MATERIALS**

To: Tanvir Rahman
Wigdor LLP
85 Fifth Avenue
New York, NY 10003
Attorneys for Defendant Zoe Farrell

PLEASE TAKE NOTICE that on January 22, 2019, or on such date and time as counsel may be heard, Plaintiffs Clover Health Investments Corp. and Clover Health LLC (collectively, “Clover”) by and through their undersigned attorneys, K&L Gates LLP, shall move before the Honorable Steven C. Mannion pursuant to Fed. R. Civ. P. 26 and L. Civ. R. 5.3 for the entry of an Order sealing Clover’s Complaint in the instant action (ECF No. 1).

PLEASE TAKE FURTHER NOTICE that Clover shall rely upon the declaration of Anthony P. La Rocco submitted herewith, and on all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

K&L GATES LLP

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*Attorneys for Plaintiffs
Clover Health Investments Corp. and
Clover Health LLC*

By: /s/ Anthony P. La Rocco
Anthony P. La Rocco

Dated: December 18, 2018